



The Greater Bethesda-Chevy Chase Chamber of Commerce

7910 Woodmont Avenue, Suite 1204, Bethesda MD, 20814 • Ph (301) 652-4900 • Fax (301) 657-1973 • Email staff@bccchamber.org • Web www.bccchamber.org

Your Business Is
Our Only Business

January 28, 2008

Via Facsimile and Messenger

Officer in Charge – BRAC
National Naval Medical Center
8901 Wisconsin Avenue
Bethesda, MD 20889
Fax: (301) 295-5020

Re: Comments on Draft Environmental Impact Statement from
The Greater Bethesda-Chevy Chase Chamber of Commerce

Dear Officer in Charge:

On behalf of The Greater Bethesda-Chevy Chase Chamber of Commerce (the “Chamber”), we submit our comments on the Draft Environmental Impact Statement (“DEIS”) regarding the relocation of the Walter Reed Army Medical Center (“Walter Reed”) to the National Naval Medical Center (“NNMC”) in Bethesda, Maryland. The Chamber is honored to have a world-class medical facility with the critical mission of taking care of our wounded service people as a neighbor. However, in order for the NNMC expansion to be successful, we all have to work together to mitigate the potential negative impacts on the surrounding transportation network and community.

The relocation of Walter Reed to NNMC is a unique challenge and opportunity. It is the first and only Base Realignment and Closure (“BRAC”) action in a highly urbanized location, which will increase the traffic stresses on an already congested area. Unlike other BRAC actions that produce increased housing demands and economic development opportunities, we do not anticipate many economic benefits to Bethesda and the surrounding areas. Few, if any, Walter Reed employees are expected to relocate and no new businesses are expected to move to the Bethesda area as a result of the BRAC action. The relocation may even negatively impact the economic development potential of the Bethesda Central Business District and surrounding areas because new development opportunities may be abandoned or compromised due to BRAC’s increased demands on the area’s transportation system. On a more opportunistic note, the proximity of NNMC to two other major health care facilities, the National Institutes of Health (“NIH”) and Suburban Hospital, provides unique opportunities for healthcare and operational collaboration as the NNMC campus expands. These unique characteristics of the NNMC BRAC action must be acknowledged in order to set the proper context for the final EIS, as well as to justify particularized mitigation measures.

Against this background, the Chamber presents the following comments on the DEIS:

- **Data** - The DEIS lacks critical data and studies, particularly regarding on-site parking, gate operations and proposed intersection improvements, that must be provided in the final EIS.

- **Slip Ramp** – The final EIS should contain a detailed study of the slip ramp option, which would provide a direct vehicular connection from I-495 to the NNMC campus. This study should evaluate the opportunity for access from NNMC to both eastbound and westbound I-495. It should also comprehensively examine ways to enhance the transportation efficiencies of both the NNMC campus and NIH, including the potential circulation of NIH vehicles from I-495 through the NNMC campus.
- **Defense Access Road Program** – The Final EIS should suggest a modification to the Defense Access Road Program (“DAR”) standard to allow federal funding for recommended road improvements. The current DAR standard would only permit such funding if the NNMC campus expansion were to at least double the amount of traffic on area roads. This standard, which appears tailored to address the effects of rural base expansions, is inappropriate for the highly urbanized setting of the NNMC campus. The relocation of Walter Reed should be used as an opportunity to lessen the DAR standards under NNMC’s unique circumstance in order to address the dramatic traffic impacts that will occur outside the campus gates.
- **Transportation Management Plan** - The final EIS should include a Transportation Management Plan that addresses commuting/travel goals for employees, patients and visitors.
- **Metro** - The final EIS should recommend the construction of a Metro entrance at the southwest corner of the NNMC campus as well as additional Kiss and Ride opportunities around the NNMC campus.
- **Pedestrian Improvements** – The final EIS should incorporate transit-oriented development principles in the NNMC campus enhancement, such as safe and convenient pedestrian access to the Metro and the amenities of downtown Bethesda. The Chamber supports the DEIS recommendation for a pedestrian connection (in the form of a bridge or tunnel) that would link the east and west sides of Wisconsin Avenue.
- **Fringe Parking** - The Chamber opposes any satellite parking in the immediate area as being inconsistent with transit-oriented development goals. However, the Chamber would support strategic satellite parking programs outside of the immediate area that would make it easier for commuters to use public transportation.
- **VIP Visits** – the final EIS should include an analysis of the transportation impact of VIP visits to the NNMC campus.
- **Traffic Enforcement** – The final EIS should recommend aggressive traffic enforcement during peak commuting hours to minimize unnecessary traffic delays (e.g. illegal pick ups and drop offs).
- **Land Use and Zoning** - The final EIS needs to analyze the impact that the NNMC expansion will have on potential development in the area, particularly the White Flint corridor and the Woodmont Triangle. As a result of sector plan changes and County policies to concentrate development around Metro Stations, these areas have achieved (or will achieve) greater development densities. The traffic that is generated by the BRAC move will definitely impact the amount and type of allowable development. This impact needs to be addressed.
- **Community Liaison** – Like other members of the surrounding community, the Chamber advocates the immediate establishment of a Community Liaison Council. This Council would facilitate communication and problem-solving between NNMC and its neighbors. It would also search for ways to incorporate NNMC into the Bethesda-Chevy Chase community, particularly in regard to mutually beneficial business and entertainment opportunities.

- **Unique BRAC** – The final EIS should address the unique characteristics of this BRAC including the first and only urban BRAC in the country and its proximity to two other major medical institutions (NIH and Suburban Hospital). Regarding the latter, the final EIS should discuss how the combined entities form a medical “megaplex” that could be a model for the country. In addition, the unique healthcare synergy among NNMC, NIH and Suburban Hospital could be used to address mutual employment and operational issues regarding housing, transportation and security.

We note that the expansion of the NNMC campus presents the perfect opportunity to implement two of the Chamber’s top transportation priorities: (i) construction of the Purple Line light rail connection along the Georgetown Branch alignment from Bethesda to Silver Spring and (ii) the construction of the south entrance to the Bethesda Metro Station. These transit improvements would provide a better, more convenient way to link employees and jobs between Montgomery County’s two downcounty urban centers and thus encourage transit ridership between these two transportation management districts. The improvements will also provide convenient access for Purple Line riders to the Metro Red Line then to the Medical Center Metro Station. Thus, employees traveling to the expanded NNMC from the eastern portion of the County will have direct transit access to the campus.

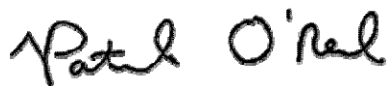
As stated above, the Chamber welcomes the Walter Reed relocation to NNMC because we recognize that our nation’s military personnel deserve the first class medical care that the expanded facility will provide. Notwithstanding this support, the Chamber has consistently advocated that the relocation must be done well. Our comments, as well as others, provide the needed guidance that is currently lacking in the DEIS to ensure that this BRAC will be successful.

Thank you for your consideration of the Chamber’s comments on this very important matter. We look forward to coordinating with you as the relocation process continues.

Sincerely,



Kevin P. Maloney, Chairman
(Maloney & Metz)



Patrick L. O’Neil
Vice President for Economic Development and Government Relations
(Lerch, Early & Brewer, Chtd.)

CC:

The Honorable Isaiah Leggett
The Honorable Michael Knapp
The Honorable Roger Berliner
The Honorable Royce Hanson
The Honorable Barbara Mikulski
The Honorable Benjamin Cardin
The Honorable Christopher Van Hollen

The Honorable Martin O’Malley
The Honorable Anthony G. Brown
The Honorable Brian Frosh
The Honorable William A. Bronrott
The Honorable C. William Frick
The Honorable Susan C. Lee
Mr. John Carman